

Jorge Alejandro Rojas
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Plaintiff in Pro Se
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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JORGE ALEJANDRO ROJAS,

Plaintiff,

v.

UNPLUGGED MEDIA, LLC, and
ALEXANDER BYKHOVSKY,

Defendants.

Case No. 2:23-cv-02667-SPG-KS

District Judge Sherilyn Peace Garnett
Magistrate Judge Karen L. Stevenson

**REQUEST FOR CLERKS ENTRY OF
DEFAULT AS TO ALEXANDER
BYKHOVSKY**

Plaintiff, Jorge Alejandro Rojas, pursuant to Fed. R. Civ. P. 55(a), requests the Clerk make an Entry of Default against Defendant Alexander Bykhovsky (“Bykhovsky”).

Defendant Bykhovsky was served (Dkt. 37) with the Amended Complaint (Dkt. 12) on January 24, 2024 by a process server to his e-mail, alexgoldlv@gmail.com, pursuant to this Court’s order granting alternative service via e-mail, Dkt. 36 (“Accordingly, the Court grants Plaintiff’s motion for alternative service, insofar as it requests to serve Bykhovsky by email”). Plaintiff notes that the read receipt included in the e-mail transmission has identified Bykhovsky reading the e-mail at least once. Dkt. 37 p. 3.

More than twenty one (21) days following service have elapsed. Bykhovsky is not an infant, in the military, or incompetent, and has failed to plead or otherwise defend this

1 action. Bykhovsky attempted to file a Motion to Dismiss, which the Court struck on
2 February 26, 2024 for failure to notice a hearing date and a failure to confer (Dkt. 43)¹.

3 To date, Plaintiff has not been served with a copy of any responsive pleading.
4 Bykhovsky has also yet to confer with Plaintiff regarding any motion. Plaintiff e-mailed a
5 copy of the Court's strike order to Bykhovsky on March 1, 2024, and has received no e-
6 mails from Bykhovsky in response. E-mail tracking has identified that Bykhovsky has
7 opened the e-mail at least three times.

8 Plaintiff intends to seek entry of default judgment pursuant to Fed. R. Civ. P. 55(b)
9 as to all Defendants within thirty (30) calendar days of the entry of the clerk's entry of
10 default – unless the Court orders a shorter time period.

11 Respectfully submitted,

12 Dated: March 5, 2024.

13 /s/ Jorge Alejandro Rojas
14 Jorge Alejandro Rojas
15 Rojas.jorge96@gmail.com
16 Plaintiff in Pro Se
17 557 Cambridge Way
18 Bolingbrook, IL 60440
19 (424) 219-1582

20 **CERTIFICATE OF SERVICE**

21 A copy of this filing will be sent to each Defendants last known address and/or
22 registered agent via USPS First Class Mail, and via e-mail to alexgoldlv@gmail.com.
23

24 Dated: March 5, 2024.

25 /s/ Jorge Alejandro Rojas
26
27
28

¹ Plaintiff believes the motion was also deficient because it did not contain a certificate of service, a signature, or contact information for the party.